

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GARY KOOPMANN, TIMOTHY KIDD and
VICTOR PIRNIK, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff(s),

v.

FIAT CHRYSLER AUTOMOBILES N.V.,
SERGIO MARCHIONNE, RICHARD K.
PALMER, SCOTT KUNSELMAN, MICHAEL
DAHL, STEVE MAZURE and ROBERT E.
LEE

Defendants.

Civ. Action No: 15-cv-07199-JMF

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**DECLARATION OF SARA FUKS IN OPPOSITION TO DEFENDANTS'
MOTION TO EXCLUDE THE TESTIMONY OF ANTHONY ANDREONI**

I, Sara Fuks, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am counsel at the Rosen Law Firm, P.A., appointed by the Court as Co-Class Counsel for the Class Representatives Gary Koopmann, Timothy Kidd, and Victor Pirnik, in the above captioned action.
2. I submit this declaration in conjunction with Plaintiffs' Memorandum of Law in Opposition to Defendants' Motion to Exclude the Testimony of Anthony Andreoni, and to place before the Court certain documents relevant to Plaintiffs' Opposition.
3. Attached hereto as Exhibit 1 is a true and correct copy of the Consent Decree entered on January 1, 2019 in *In re: Chrysler-Dodge-Jeep EcoDiesel Marketing, Sales*

Practices, and Products Liability Litigation, No. 3:17-md-02777-EMC.

4. Attached hereto as Exhibit 2 is a true and correct copy of the Deposition Transcript of Anthony Andreoni, dated November 13, 2018.
5. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the Deposition Transcript of Daniel C. Esty, dated October 17, 2018.
6. Attached hereto as Exhibit 4 is a true and correct of copy of FCA-PIRNIK-001635927-FCA-PIRNIK-00163928, a document produced by Defendants in this action.
7. Attached hereto as Exhibit 5 is a true and correct of copy of FCA-PIRNIK-001635858- FCA-PIRNIK 001635870, a document produced by Defendants in this action.
8. Attached hereto as Exhibit 6 is true and correct copy of the Fiat Chrysler Automobiles NV (FCAU) Sergio Marchionne on Q1 2016 Results Earnings Call Transcript, dated April 26, 2016, with the relevant excerpt highlighted.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 18th day of January 2019, in New York, NY

/s/ Sara Fuks
Sara Fuks